

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN**

IN RE:

ERICA E. BROUSE and  
GERALD F. BROUSE

Case #: DK 19-01650  
Chapter 13  
Hon. Scott W. Dales  
Filed: April 16, 2019

\_\_\_\_\_  
Debtors. \_\_\_\_\_/

**TRUSTEE'S OBJECTION TO APPLICATION FOR ADDITIONAL ATTORNEY  
FEES AND RECOVERY OF COSTS ADVANCED**

NOW COMES Barbara P. Foley, Trustee, by and through her Staff Attorney, Kurt A. Steinke, and objects to the Application as follows:

1. The Debtors' attorney filed his request for additional compensation on July 1, 2021, seeking approval of additional fees of \$1,182.50 and expenses of \$28.86.
2. The Notice to Creditors that was attached to the Application indicates that allowance of the fees will reduce the amount paid to general unsecured creditors and may delay payment to general unsecured creditors.
3. The Plan is currently paying zero to unsecured creditors, so the amount to unsecured creditors cannot be reduced or delayed.
4. Pursuant to the Trustee's calculation, the Plan is currently running more than 60 months and the allowance of additional fees will only exacerbate the feasibility problem.

**WHEREFORE** the Trustee prays this Court deny the Application for Additional Attorney Fees and Recovery of Costs Advanced and grant any other relief the Court deems equitable and appropriate.

BARBARA P. FOLEY  
CHAPTER 13 TRUSTEE

July 19, 2021

By: /s/ Kurt A. Steinke  
Kurt A. Steinke (P44538)  
Attorney for Trustee  
P.O. Box 51109  
Kalamazoo, MI 49005  
Ph. 269-343-0305